

EXHIBIT F

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

PRO-LIFE ACTION MINISTRIES, Case No. 23-CV-00853
LUCY MALONEY, THOMAS WILKIN, (ECT/DJF)
and DEBRA BRAUN,

Plaintiffs,

vs.

CONFIDENTIAL

CITY OF MINNEAPOLIS, a
Minnesota municipality,

Defendant.

The VIDEOTAPED DEPOSITION of TIMOTHY D.
STANLEY, taken pursuant to Notice of Taking Deposition,
at 150 South Fifth Street, Suite 3100, Minneapolis,
Minnesota, before Gail M. Hinrichs, Registered
Professional Reporter and Notary Public, taken on the
16th day of September, 2024, commencing at
approximately 10:09 a.m.

A P P E A R A N C E S

APPEARING FOR THE PLAINTIFFS:

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APPEARING FOR PLANNED PARENTHOOD AND TIMOTHY STANLEY:

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ALSO PRESENT: Adam Wallin, Video Operator;
Tiernee Murphy, Planned Parenthood

*The Original is in the possession of Attorney
B. Tyler Brooks.*

* * *

1 VIDEO OPERATOR: We are on record.
2 This is the video recorded deposition of Timothy D.
3 Stanley, taken on September 16, 2024. The time now
4 is 10:09 a.m.

5 This deposition is being taken in the
6 matter of Pro-Life Action Ministries, Lucy Maloney,
7 Thomas Wilken, and Debra Braun versus the City of
8 Minneapolis, in the United States District Court,
9 District of Minnesota, case number 23-CV-00853,
10 ECT/DJF.

11 This deposition is taking place in
12 Minneapolis, Minnesota. My name is Adam Wallin, the
13 videographer representing Kirby Kennedy and
14 Associates.

15 Will counsel please identify themselves
16 for the record.

17 MR. BROOKS: Tyler Brooks of the
18 Thomas More Society here with Peter Breen, also with
19 the Thomas More Society, for the plaintiffs.

20 MR. HENNIGAN: Oh. Peter Hennigan,
21 with the law firm of Masselon LLP, representing Tim
22 Stanley at this deposition, and with me today is
23 Tiernee Murphy, in-house counsel at Planned
24 Parenthood.

25 MS. FUSSY: Tracey Fussy on behalf

1 and asking permission to paint the sidewalk, but our
2 bandwidth is stretched and we need to maximize
3 impact. Keep pressure on and let me know how I can
4 help.

5 Did I read that correctly?

6 A You did.

7 Q And that's an email that you sent to
8 Council Member Goodman?

9 A Correct.

10 Q Let me ask you this: What do you mean at
11 either city hall?

12 A Meaning either Minneapolis or Saint Paul
13 is what I believe I meant by that statement.

14 Q And when you say big talk, what types of
15 big talk were you referring to?

16 A I would say years of discussion about
17 how -- how elected officials can help Planned
18 Parenthood.

19 Q And this Chapter 405 was a way to help
20 Planned Parenthood?

21 A I would say that Chapter 405 is -- is one
22 way that Planned Parenthood can be -- can be
23 assisted by -- by the city, any city or -- or
24 municipality.

25 Q And then you offer this statement: Even

1 though all we're doing is reiterating the FACE Act
2 and asking permission to paint the sidewalk. We'll
3 talk about the sidewalk in a second.

4 Reiterating the FACE Act, are you
5 referring to the federal FACE Act there?

6 A Correct, yes.

7 Q And is that how you interpret what
8 Chapter 405 does is merely reiterates the FACE Act?

9 A That's what I've been told that's what it
10 does.

11 Q Okay. Is that, in fact, what it does?

12 MR. HENNIGAN: Objection, calls for
13 legal conclusion.

14 BY MR. BROOKS:

15 Q You can answer.

16 A So, again, based on what I've heard, it
17 very closely resembles the federal FACE Act.

18 Q Who told you that it simply reiterated
19 the FACE Act?

20 A I don't -- I don't recall.

21 Q Who has told you that it closely
22 resembles the federal FACE Act?

23 A I don't recall.

24 Q And asking permission to paint the
25 sidewalk, what were you wanting to paint the